

Serial No. 10/518,211

Docket No. PU020299

Remarks/Arguments

In the non-final Office Action dated July 9, 2008, it is noted that claims 1 – 11 are pending in the application.

In the present response, claims 1 – 11 are not amended.

Provisional Rejection of claims 1 – 6 under nonstatutory obviousness-type double patenting as being unpatentable over claims 1 – 3 of copending Application No. 10/518,212 In view of Self et al. (U.S. Pat 5,634,043)

As these are provisional rejections, Applicants will address these rejections upon the issuance of claims in one of the pending applications.

Rejection of claims 7, 10 and 11 under 35 U.S.C. 103(a) as being unpatentable over Tsukakoshi et al. (US Pat 6,577,634), hereinafter referred to as Tsukakoshi, in view of Civanlar et al. (US Pat 6,078,963), hereinafter referred to as Civanlar.

Applicants submit that for at least the following reasons, claims 7, 10 and 11 are patentable over Tsukakoshi and Civanlar, either singly or in combination.

For example, claim 7 requires:

"means for coupling said at least three linear expandable broadcast router components in a fully interconnected topology on said input sides of said at least three linear expandable broadcast router components." (Emphasis added)

In the Office Action, page 4, it is alleged by the Office that in Tsukakoshi, Fig. 2, having the routers interconnected on one side is the same as having the router components interconnected on the input side, as claimed. Applicants respectfully disagree.

Although Tsukakoshi, Fig. 2, shows that the routers 12 are interconnected by a router-to-router switch 13, Applicants submit that it does not follow that the input sides of the router components are fully interconnected. This is because, nothing in Tsukakoshi, teaches or suggests that there is an input side and an output side on each of the router components. Although Tsukakoshi shows the interconnection among router boxes 12 linking each of their top sides in Fig. 2, Tsukakoshi does not disclose

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that the top sides of the router boxes 12 represent the input sides of the router components. Thus, the interconnection among routers disclosed in Tsukakoshi does not teach or even suggest that the input sides of the router components are fully interconnected. Furthermore, Tsukakoshi, Fig. 2 shows that the routers are connected to communication terminals 26. Since communication terminals in general can send and receive data, the input side and output side of the routers must be connected to the terminals via some connections. Clearly, Tsukakoshi, Fig. 2, does not show that the connections to the terminals 26 are fully interconnected, yet these connections may be used to receive inputs, and thus the inputs sides of the routers are not fully interconnected. Therefore, Tsukakoshi fails to disclose the claimed feature: means for coupling said at least three linear expandable broadcast router components in a fully interconnected topology on said input sides of said at least three linear expandable broadcast router components.

Applicants further submit that Civanlar does not in any way cure the defect present in Tsukakoshi as discussed above. Although Civanlar, Fig. 1, apparently shows that a plurality of intelligent router ports 103 are interconnected by a switching fabric 102, Applicants submit that Civanlar does not disclose that the input sides of the router components are fully interconnected. Civanlar does not teach or suggest that these connections are connections among the input sides of the router components. Furthermore, Civanlar, Fig. 2 shows separately a network interface 110 connecting to a network node, and a link to switching fabric (bottom right link). Applicants submit that network interfaces are generally used for sending and receiving data. This clearly suggests that the input and output of the router is through the network interface 110, and that the interconnection formed by the switching fabric 102 is not among input sides of the routers. In addition, Civanlar does not teach or suggest that these network interfaces 110 are fully interconnected. Yet, these network interfaces may be used for receiving inputs. Therefore, Civanlar also fails to disclose the claimed feature: means for coupling said at least three linear expandable broadcast router components in a fully interconnected topology on said input sides of said at least three linear expandable broadcast router components.

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In view of at least the foregoing, Applicants submit that claim 7 is patentable over Tsukakoshi and Civanlar, either singly or in combination.

Similarly, independent claim 10 requires:

*"coupling, using a first discrete path, said input side of said first router to said input side of said second router;
coupling, using a second discrete path, said input side of said first router to said input side of said third router; and
coupling, using a third discrete path, said input side of said second router to said input side of said third router."*

Therefore, in claim 10, the input sides of the three routers are fully coupled by three discrete paths. Applicants submit that similar to the arguments discussed above for claim 7, Tsukakoshi and Civanlar fail to disclose that the input sides of the routers are fully coupled, and thus fail to disclose the claimed feature: coupling, using a first discrete path, said input side of said first router to said input side of said second router; coupling, using a second discrete path, said input side of said first router to said input side of said third router; and coupling, using a third discrete path, said input side of said second router to said input side of said third router. Therefore, claim 10 is patentable over Tsukakoshi and Civanlar, either singly or in combination.

Claim 11 is patentable because at least it depends from claim 10 with further distinguishing features. Withdrawal of the rejection of claims 7, 10 and 11 under 35 U.S.C. 103(a) is respectfully requested.

Rejection of claims 8 and 9 under 35 U.S.C. 103(a) as being unpatentable over Tsukakoshi in view of Civanlar, as applied to claim 7 above, and further in view of Lydon et al. (US Pat 6,680,939), hereinafter Lydon.

Applicants submit that Lydon does not in any way cure the defects present in Tsukakoshi and Civanlar as discussed above with respect to claim 7. Therefore, claims 8 and 9 are patentable for at least the reason that they depend from claim 7, with each claim containing further distinguishing features. Withdrawal of the rejection of claims 8 and 9 under 35 U.S.C. 103(a) is respectfully requested.

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Conclusion

Having fully addressed the Examiner's rejections it is believed that, in view of the preceding remarks, this application stands in condition for allowance. Accordingly then, reconsideration and allowance are respectfully solicited. If, however, the Examiner is of the opinion that such action cannot be taken, the Examiner is invited to contact the applicant's attorney at (609) 734-6817, so that a mutually convenient date and time for a telephonic interview may be scheduled.

Respectfully submitted,
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